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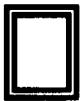
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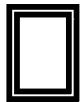
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

6/23/89
BY TELEFAX

Mr. Stephen W Holt
Project Coordinator
Environmental Control Department
NL Industries, Inc.
P.O. Box 1090
Hightstown, NJ 08520

Dear Mr. Holt:

U.S. EPA and Illinois EPA have reviewed the April 1989 Alternatives Development Report for the NL Industries-Granite City, Illinois site and have the following comments:

Major Comments

1. General Comment - None of the on-site landfilling alternatives include the use of a bottom liner which would be a more permanent and protective solution. An additional preliminary alternative must be included which includes landfilling on-site using a liner and cap which comply with ARARs (i.e. RCRA). It will probably be necessary to purchase property adjacent to the Taracorp pile to construct the landfill. Elements of this alternative should be the same as Alternative D except that this new alternative as well as Alternative D should include placement of materials from Area 1 SLLR piles in the on-site landfill unless recycling of the hard rubber into rubber-phalt can be shown to effectively reduce the mobility of contaminants.

2. General Comment - An alternative employing full excavation (i.e. excavation and restoration of areas "3", "4", & "5") should be added to the report, as well as a variation of Alternative D with deeper excavation (e.g. 12" depth of excavation). It may be possible to combine the three additional alternatives required by comments #1 and #2, along with Alternative D, such that the total number of alternatives analyzed in Section 3 of the report is seven, rather than eight as is suggested by strict application of comments #1 and #2.
3. General Comment - For all alternatives, Area 3 is more appropriately grouped with Area 2 rather than Areas 4 and 5 based on lead concentrations and land use. In general, areas designated in Figure 4 should match the designations in Figure 2, and both figures should represent the actual situation in Granite City.
4. Page 14, Section 1.6, last sentence - CERCLA/SARA specifies that the more stringent chemical specific ARAR applies whether state or federal. The February 1, 1989 letter from U.S. EPA to NL only indicates that the State of Illinois is authorized to operate their hazardous waste management program in lieu of the Federal program, with the exception of HSWA requirements.
5. Pages 15-17 Ground Water - The U.S. EPA Ground Water Protection Strategy discussed here has not been adopted by, and is therefore not applicable in, the State of Illinois. Discussion of this strategy must be deleted. State regulations applicable to underground waters are designated in 35 IAC Subtitle C section 303.203 and must be discussed in this section. Underground water in the vicinity of the site is a potential source of water for a public or food processing supply.
6. Page 17, Section 1.6.2 - The fugitive dust regulations of the Clean Air Act and OSHA regulations for site workers must be mentioned in this section.

7. Page 20, line 3 - "not" should be deleted from this line.
8. Page 20, lines 10-14 and Page 21 Waste Piles - The basis for the response objective of 4800 mg/kg for heavy industrial zoned areas and Waste Piles is not included. The method used to arrive at this concentration must be clearly described or a reference included in the document which contains a description. U.S. EPA and Illinois EPA will comment fully, if necessary, once the description/basis is provided.
9. Page 27, Section 2.3.3 - All non-“cap” alternatives (paving, laying sod, etc) should have consideration given to the effects of weathering of the cover and freeze/thaw particle up migration.
10. Page 37 Second Paragraph - a deeper background well should correspond to the deeper downgradient well (depth and screened interval).
11. Page 40, Third Full Paragraph - “subject to public recreational activities” must be clearly defined and/or illustrated on a figure.
12. Page 41, Section 3.1.4 - The narrative for Alternative D does not coincide with the “Remedial Alternative Matrix” (unmarked final table). Area 1 unpaved areas should be excavated and restored. Area 1 SLLR pile should be recycled, if feasible, and consolidated in the Taracorp pile.
13. Table 4, Action Specific ARARs, 19. and Location Specific ARARs, 20. - The reference should indicate Subtitle G rather than C.
14. “Remedial Alternative Matrix” - monitoring should be ground water and air monitoring, and rubber-phalt must be proven feasible in order to be applied.
15. Figures 5 and 6 - comments on the extent of removal of materials in Venice and Eagle Park Acres will be withheld until U.S. EPA and Illinois EPA receive the draft Feasibility Study Report.

Minor Comments

- m1. Page 6, line 4 - delete “mg/kg”.
- m2. Page 18, “Landf. II Cff-Site”, line 5 - “are not” should be “may not be”.

3. Page 37, First Paragraph - Illinois EPA air monitoring data will need to be supplemented during remedial construction and initial post-construction phases. This is a major comment and should actually be located between comment #9 and comment #10 of this letter.
- m4. Page 39, first sentence - this sentence is vague and should be expanded for clarity.
- m5. Page 40, Third Full Paragraph, line 3 - "resurfaced in accordance with present land use" is a vague statement and should be clarified.
- m6. Page 43, first sentence - the basis for determining when excavation is complete should be specified.

The comments provided above do not represent a Consent Order-mandated response by U.S. EPA and Illinois EPA and are provided only to bring out issues of concern to the agencies in an effort to expedite the approval process for the Feasibility Study Report.

If you have any questions concerning this letter, please contact me at (312) 886-4742.

Sincerely yours,

I Brad Bradley
U.S. EPA Project Coordinator
Cc: Ken Miller, IEPA

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¹ See also the discussion of the relationship between the two in the section on "Theoretical Approaches" above.

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